

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION, a
Delaware corporation,

Defendants.

C.A. No. 04-1371-JJF

**CONSOLIDATED DECLARATION OF MICHAEL R. HEADLEY
IN SUPPORT OF PLAINTIFF POWER INTEGRATIONS, INC.'S
MOTION TO AMEND THE COMPLAINT OR, IN THE ALTERNATIVE, TO
COMPEL DEFENDANTS TO PRODUCE WITNESSES AND
MOTION TO SHORTEN TIME**

I, Michael R. Headley, declare as follows:

1. I am an associate of Fish & Richardson P.C., counsel of record in this action for Plaintiff Power Integrations, Inc. ("Power Integrations"). I am a member of the Bar of the State of California and am admitted *pro hac vice* for the above-captioned action. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. On July 28, 2005, I spoke Bas de Blank, counsel for Defendants Fairchild Semiconductor Corporation and Fairchild Semiconductor International, Inc. ("Fairchild"), regarding the details for the upcoming depositions of Fairchild employees in this case. During that call, Mr. de Blank noted that Fairchild would not offer any Fairchild Korea employees for 30(b)(1) depositions and that Fairchild would only offer three selected witnesses in Korea as its 30(b)(6) witnesses on technical issues. We agreed during that call, and reiterated during a subsequent call that day, that this issue

was ripe for adjudication and that it was proper to resolve this matter by motion before we travel to Korea.

3. Attached as Exhibit 1 is a true and correct copy of an excerpt of Fairchild Semiconductor International, Inc.'s 10-K, dated March 11, 2005.

4. Attached as Exhibit 2 is a true and correct copy of a letter I sent to Mr. de Blank, counsel for Defendants, on July 29, 2005, confirming our discussions regarding depositions of Fairchild employees.

4. Attached as Exhibit 3 is a true and correct copy of a letter I received from Bas de Blank, counsel for Defendants, on July 29, 2005.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 8th day of August, 2005, at Redwood City, California.

/s/ Michael R. Headley
Michael R. Headley

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2005, I electronically filed the **CONSOLIDATED DECLARATION OF MICHAEL R. HEADLEY IN SUPPORT OF PLAINTIFF POWER INTEGRATIONS, INC.'S MOTION TO AMEND THE COMPLAINT OR, IN THE ALTERNATIVE, TO COMPEL DEFENDANTS TO PRODUCE WITNESSES AND MOTION TO SHORTEN TIME** with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

Steven J. Balick, Esq.
John G. Day, Esquire
Ashby & Geddes
222 Delaware Avenue, 17th Floor
P. O. Box 1150
Wilmington, DE 19899

Attorneys for Defendant-
Counterclaimant
FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC. and
FAIRCHILD SEMICONDUCTOR
CORPORATION

I hereby certify that on August 8, 2005, I have mailed the document(s) via Federal Express to the following non-registered participants:

G. Hopkins Guy, III
Bas de Blank
Duo Chen
Orrick, Herrington & Sutcliffe, LLP
1000 Marsh Road
Menlo Park, CA 94025

Attorneys for Defendants
FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC. and
FAIRCHILD SEMICONDUCTOR
CORPORATION

/s/ Sean P. Hayes

Sean P. Hayes